

EXHIBIT 1

Exhibit Declaration of Julie Dalessio re;
Plaintiff's Motion to Reconsider

Julie Dalessio
1110 29th Ave
Seattle, WA 98122

Re: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM

JULIE <juliedalessio@msn.com>

Mon 6/5/2017 11:17 AM

Sent Items

To: Jayne L. Freeman <JFreeman@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>;

Cc: Derek C. Chen <DChen@kbmlawyers.com>;

1 attachments (490 KB)

JOINT STATUS REPORT AND DISCOVERY PLAN draft 6:3:2017 copy.docx;

i had a hard time working with your draft, so i started over.

please review the attached and note anything that's not acceptable.

see in particular 4D, Privilege issues and 4F, need for discovery related orders.

thanks,
julie dalessio
206 324 2590

From: Jayne L. Freeman <JFreeman@kbmlawyers.com>
Sent: Thursday, June 1, 2017 10:21:37 AM
To: JULIE; LaHoma Walker
Cc: Derek C. Chen
Subject: RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM

Ms. Dalessio: attached please find a revised DRAFT Joint Status Report and Discovery Plan per our FRCP 26 conference last week. If you propose further changes, go ahead and make them on the draft and send it back for our review so we can move towards a final draft for filing with the court. If you could use the "track changes" function that would be great. Thank you.

Jayne L. Freeman
KBM KEATING, BUCKLIN
& McCORMACK

800 5th Avenue, Suite 4141
Seattle, WA 98104
Office: (206)623-8861
FAX: (206)223-9423
jfreeman@kbmlawyers.com

EXHIBIT 2

Exhibit Declaration of Julie Dalessio re;
Plaintiff's Motion to Reconsider

Julie Dalessio
1110 29th Ave
Seattle, WA 98122

From: **Jayne L. Freeman** JFreeman@kbmlawyers.com
Subject: RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM--another revised DRAFT JSR
Date: **June 5, 2017 at 1:42 PM**
To: **JULIE** juliedalessio@msn.com, **LaHoma Walker** LWalker@kbmlawyers.com
Cc: **Derek C. Chen** DChen@kbmlawyers.com



Ms. Dalessio: thank you for returning your changes. I have attempted to incorporate them into the draft JSR pleading we had started. Attached is a "track changes" red-lined version, as well as another Word version where the track changes are accepted and I attempted to fix some of the formatting. If there are further changes you think are necessary to your positions on the clean version, please let me know by either track changes, send back highlighted changes, or whatever works best so we can get it finalized. I will be out at depositions, etc. this week, so I'd like to get it to the final form as soon as possible. Thank you.

Jayne L. Freeman



800 5th Avenue, Suite 4141
Seattle, WA 98104
Office: (206)623-8861
FAX: (206)223-9423
jfreeman@kbmlawyers.com

www.kbmlawyers.com

From: JULIE [mailto:juliedalessio@msn.com]
Sent: Monday, June 05, 2017 11:17 AM
To: Jayne L. Freeman <JFreeman@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>
Cc: Derek C. Chen <DChen@kbmlawyers.com>
Subject: Re: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM

i had a hard time working with your draft, so i started over.

please review the attached and note anything that's not acceptable.

see in particular 4D, Privilege issues and 4F, need for discovery related orders.

thanks,
julie dalessio
206 324 2590

From: Jayne L. Freeman <JFreeman@kbmlawyers.com>
Sent: Thursday, June 1, 2017 10:21:37 AM
To: JULIE; LaHoma Walker
Cc: Derek C. Chen
Subject: RE: Dalessio v. University of WA Case No. 2:17-cv-00642-RSM

EXHIBIT 3

Exhibit Declaration of Julie Dalessio re;
Plaintiff's Motion to Reconsider

Julie Dalessio
1110 29th Ave
Seattle, WA 98122

Re: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM--another revised DRAFT JSR

JULIE <juliedalessio@msn.com>

Mon 6/5/2017 4:46 PM

To: Jayne L. Freeman <JFreeman@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>;

Cc: Derek C. Chen <DChen@kbmlawyers.com>;

1 attachments (493 KB)

Joint Status Report draft 6:5:2017.docx;

i just don't think that it is appropriate for you to mis-state my assertions then deny the mis-stated claims!

also, since this is a status report and discovery plan, i don't think that your opinions about my claims are appropriate here.

i've tried to accurately state your positions without the judgments.

If you disagree with anything in the attached draft, please let me know.

If not, I will send a final pdf version for your signature, and then file thru ecf by thursday.

I'm sorry that i am "technically challenged" so that i can't make this easier for you!

thank-you,
julie dalessio
206 324 2590

From: Jayne L. Freeman <JFreeman@kbmlawyers.com>

Sent: Monday, June 5, 2017 1:42:45 PM

To: JULIE; LaHoma Walker

Cc: Derek C. Chen

Subject: RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM--another revised DRAFT JSR

Ms. Dalessio: thank you for returning your changes. I have attempted to incorporate them into the draft JSR pleading we had started. Attached is a "track changes" red-lined version, as well as another Word version where the track changes are accepted and I attempted to fix some of the formatting. If there are further changes you think are necessary to your positions on the clean version, please let

EXHIBIT 4

Exhibit Declaration of Julie Dalessio re;
Plaintiff's Motion to Reconsider

Julie Dalessio
1110 29th Ave
Seattle, WA 98122

From: Derek C. Chen DChen@kbmlawyers.com
Subject: RE: joint status report CASE NO. 2:17-cv-00642 RSM
Date: June 8, 2017 at 11:42 AM
To: JULIE juliedalessio@msn.com
Cc: Jayne L. Freeman JFreeman@kbmlawyers.com, LaHoma Walker LWalker@kbmlawyers.com



Ms. Dalessio,

Thank you for your edits. It is clear we have different opinions regarding this case, but the purpose of the Joint Status Report is to update the Court regarding where we are and help the court set a case schedule.

Rather than going back and forth trying to characterize each other's statements in a way that satisfies the other party, I have attached a version of the JSR that clearly lays out "Plaintiff's Position" and "Defendant's Position."

For "Plaintiff's Position", I have incorporated **word for word** ^{not} your statements from the draft you sent last night (With one exception – I had to change 5(H) *slightly* because it had a statement regarding the position of "the parties" that did not make sense the way it was written.) This way, both parties have their versions of the case in the Report and the Court can proceed from there.

Please let me know by **3:00 PM** if you have any changes you would like to make to your statements/positions only. If not, please sign and return a copy so that we can file it with the Court.

We are truly just trying to make this as efficient as possible and fair to both sides. If you will not agree to sign the joint status report in this format, we will file it without your signature with an explanation of how the Joint Status Report was created (specifically, that it includes your statements from the version you indicated you were prepared to file, and our most recent statements.)

Thank you for your anticipated cooperation. Please feel free to contact me if you have any questions regarding the Joint Status Report.

Sincerely,

Derek Chen

From: JULIE [mailto:juliedalessio@msn.com]
Sent: Wednesday, June 07, 2017 9:33 PM
To: Jayne L. Freeman <JFreeman@kbmlawyers.com>; Derek C. Chen <DChen@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>
Subject: joint status report CASE NO. 2:17-cv-00642 RSM

Please sign and return or let me know soon if i've made any mistakes in the statements of your positions, so that I can file this tomorrow.

thanks,
julie dalessio